

The Honorable Robert S. Lasnik

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

TONDA FERRANDO and DEX MARZANO,  
individually and on behalf of all others  
similarly situated,

*Plaintiffs,*

v.

ZYNGA INC., a Delaware corporation,

*Defendant.*

Case No. 22-cv-214-RSL

**STIPULATED MOTION AND  
[PROPOSED] ORDER STAYING CASE  
PENDING FILING OF MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

**NOTING DATE:** May 6, 2021

**STIPULATED MOTION FOR STAY**

During the Parties' May 4, 2022 in-person, full-day mediation before the Hon. Layn R. Phillips (Ret.) of Phillips ADR, *see* Dkt. #12, the Parties reached a binding agreement in principle to settle this case on a class action basis. Among other provisions, the agreement provides for:

- The establishment of a \$12 million non-reversionary settlement fund;
- A release of claims by settlement class members who do not timely exclude themselves from the settlement; and
- Prospective measures.

In order to provide the Parties sufficient time to reduce their agreement to a complete class action settlement agreement, and to provide Plaintiffs sufficient time to prepare a motion for preliminary approval, the Parties jointly seek a stay of this case through June 3, 2022, by which time the Parties anticipate that Plaintiffs will have filed preliminary approval papers.

Consequently, pursuant to Local Civil Rule 10(g), the Parties respectfully request that the Court grant this stipulation and enter the attached Proposed Order.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 6th day of May, 2022.

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**[PROPOSED] ORDER**

Pursuant to Stipulation, this case is STAYED for all purposes, except for any third-party discovery necessary to effectuate the proposed settlement, through June 3, 2022.

IT IS SO ORDERED.

DATED this \_\_\_\_\_ day of May, 2022.

\_\_\_\_\_  
ROBERT S. LASNIK  
UNITED STATES DISTRICT JUDGE